

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

STEPHEN MIDDLEBROOKS	:	
	:	CIVIL ACTION NO. 17-0412
	:	
Plaintiff,	:	
v.	:	
	:	
TEVA PHARMACEUTICALS	:	
USA, INC.; TEVA PHARMACEUTICAL	:	
INDUSTRIES LIMITED	:	
	:	
Defendants.	:	
	:	

**INDEX OF PLAINTIFF'S EXHIBITS SUBMITTED IN OPPOSITION
TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

1	Deposition of Nir Aharoni
2	Deposition of Plaintiff, Stephen Middlebrooks
3	Deposition of Karin Shanahan
4	Deposition of Mini Rodriguez
5	Deposition of Jennifer Flaisher
6	Leadership & Development: Executive Coaching Form (Dep. Ex. P-107)
7	9/2014 email enclosing Leadership & Development: Executive Coaching Form (Dep. Ex. P-105)
8	10/12/15 email attaching initial draft of 2015 mid review for Stephen Middlebrooks (Dep Ex. P-25)
9	Deposition of Ilanit Strouchler
10	10/2015 emails regarding issues with Aharoni and Shemtov (Dep. Ex. P-18)
11	Deposition of Ellen Cicak
12	Deposition of Troy Gaugler
13	Deposition of John Eppley
14	Deposition of Ray Duggan
15	Deposition of Leander Jones
16	GFM Organizational Chart (Dep. Ex. P-9)
17	Plaintiff's EEOC Charge (Dep. Ex. P-56)
18	12/13/2015 email from Plaintiff to Aharoni re: PIP scorecard summary report (Dep. Ex. P-32)
19	12/15/2015 email from Plaintiff to Aharoni re: PIP review meeting (Dep. Ex. P-31)
20	12/16/2015 email from Plaintiff to Aharoni requesting written feedback re: his PIP progress (Dep. Ex. P-33)

21	1/23/2016 email from Aharoni attaching PIP Summary for Plaintiff (Dep. Ex. P-34)
22	2/16/2016 email regarding decision to terminate Plaintiff (Dep. Ex. P-36)
23	Plaintiff's 11/12/2015 internal complaint (Dep. Ex. P-28)
24	12/2/2015 emails regarding Plaintiff's complaints/investigation (Dep. Ex. P-85)
25	Defendants' Answers and Objections to Plaintiff's First Interrogatories (Dep. Ex. P-103)
26	Defendants' Second Amended Answers to Plaintiff's First Interrogatories
27	Plaintiff's 2008 Performance Review (Teva (SM) 000215-216)
28	Plaintiff's 2009 Performance Review (Teva (SM) 000211-212)
29	Plaintiff's 2011 Performance Review (Teva (SM) 000205-208)
30	Plaintiff's 2012 Performance Review (Teva (SM) 000196-204)
31	Plaintiff's 2013 Performance Review (Teva (SM) 000187-192)
32	Kristin Macone Witness Statement (Middlebrooks 2205-2206)
33	Rhonda Wilton Witness Statement (Middlebrooks 2093-2094)
34	Plaintiff's 11/10/2014 promotion letter (Dep. Ex. P-13)
35	Defendants' EEOC Position Statement
36	Plaintiff's 2014 Performance Review (Dep. Ex. P-14)
37	Investigative Report: Hostile work environment/Team Dynamics, GFM (Global Facilities Management) Team, Date: August 3, 2015 (Dep. Ex. P-17)
38	Deposition of Chris Swartz
39	2/2016 emails regarding Aharoni and Plaintiff (Dep. Ex. P-37)
40	3/2016 email regarding communication plan about Plaintiff's termination (Dep. Ex. P-96)
41	10/2015 emails regarding GFM team issues (Dep. Ex. P-18)
42	10/2015 emails regarding Aharoni performance issues (Dep. Ex. P-115)
43	1/2014 emails regarding communication plan of Plaintiff's Head of North American Global Facilities Management (Dep. Ex. P-12)
44	1/2014 emails confirming Plaintiff's appointment as Head of North American Global Facilities Management (Dep. Ex. P-10)
45	1/2014 Announcement regarding Plaintiff's appointment as Head of North American Global Facilities Management (Dep. Ex. P-11)
46	Coaching Program Overview (Dep. Ex. P-113)
47	Plaintiff's Answers and Objections to First Set of Interrogatories Served by Defendants
48	7/2015 email from Plaintiff to Aharoni enclosing self-evaluation for mid-year review (Dep. Ex. P-24)
49	10/29/2015 Performance Improvement Plan (Dep. Ex. P-27)
50	2/10/2016 PIP Summary (Dep. Ex. P-35)
51	Performance Improvement policy (Dep. Ex. P-2)
52	11/25/2015 email from Plaintiff sending a courtesy copy of his EEOC Charge to Defendants (Dep. Ex. P-29)
53	11/26/2015 email from Aharoni to Flaisher re: Plaintiff's EEOC Charge (Dep. Ex. P-30)
54	12/3/2015 email from Flaisher to Aharoni re: Plaintiff (Dep. Ex. P-59)